

## Remarks

Claims 1-27 and 29-38 are now pending in this application. Applicants have amended claims 1-4, 6, 11-15, and 27 and cancelled claim 28 to clarify the claimed invention. Claims 8-10, 15-26 and 29-38 are withdrawn from consideration by the Examiner as directed to non-elected inventions. Applicants respectfully request favorable reconsideration of this application.

The Examiner rejected claim 1 under 35 U.S.C. § 112, second paragraph, as indefinite. Applicants have amended claim 1 to clarify that the control member controls a plurality of machines. Accordingly, antecedent basis exists for "all said machines" recited in claim 1. Accordingly, Applicants respectfully request withdrawal of this rejection.

The Examiner rejected claims 1-3 and 27 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,568,593 to Demarest. The Examiner rejected claims 4 under 35 U.S.C. § 103(a) as being unpatentable over Demarest. The Examiner rejected claims 5-7 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Demarest in view of U.S. patent 5,914,880 to Yasojima. The Examiner rejected claims 11-14 under 35 U.S.C. § 103(a) as being unpatentable over Demarest in view of Yasojima and further in view of U.S. patent 4,580,207 to Arai.

Demarest does not disclose the invention recited in independent claims 1 and 27 since, among other things, Demarest does not disclose sending a message from a control member to all machines controlled by the controller. Rather, Demarest discloses utilizing a FIFO buffer 155 to communicate coordinate data. Any robot controller accepting a position removes a needle

position from the buffer, as described at col. 8, lines 4-6. Hence, the position is only received by a single robot controller. In other words, Demarest does not disclose sending a message from a control member to all machines controlled by a controller.

Sending a message of first positions to all machines controlled by a controller provides the claimed invention with a redundancy of information. By sending the list of first positions to each machine, each of the machines has all of the positions. This can permit one machine to take over if another machine experiences stoppage. This is a significant advantage in the case of a single point of failure as compared to the single FIFO buffer disclosed by Demarest.

In view of the above, Demarest does not disclose all elements of the invention recited in claims 1-3 and 27. Since Demarest does not disclose all elements of the invention recited in claims 1-3 and 27, the invention recited in claims 1-3 and 27, is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

Demarest does not suggest the invention recited in claim 4 since, among other things, as noted above, Demarest does not suggest sending a message from a control member to all machines controlled by the controller. Accordingly, Demarest does not suggest the invention recited in claim 4.

The combination of Demarest and Yasojima does not suggest the invention recited in claims 5-7 and 28 since, among other things, the combination of Demarest and Yasojima does not suggest sending a message from a control member to all machines controlled by the controller. Yasojima does not suggest a plurality of first positions or sending all first positions to a plurality of machines controlled by a controller. Therefore, the combination of Demarest and Yasojima does not suggest the invention recited in claims 5-7 and 28.

The combination of Demarest, Yasojima and Arai does not suggest the invention recited in claims 11-14 since, among other things, the combination does not suggest sending a message from a control member to all machines controlled by the controller. Arai does not suggest a plurality of first positions or sending all first positions to a plurality of machines controlled by a controller. Therefore, the combination of Demarest, Yasojima and Arai does not suggest the invention recited in claims 11-14.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not disclose or suggest patentable features of the claimed invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not anticipate the claimed invention or make the claimed invention obvious.

Accordingly, Applicants submit that the claimed invention is patentable over the cited references and respectfully request withdrawal of the rejections based on the cited references.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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